



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*610 Federal Plaza
Central Islip, New York 11722*

July 15, 2020

By ECF

Honorable Kiyo Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Greebel, 15-CR-0637 (E.D.N.Y.) (KAM)

Dear Judge Matsumoto:

This office represents the government in the above-captioned matter. The government writes to respectfully request a 31-day extension of time, from July 17, 2020 until August 17, 2020, to submit its response to defendant, Evan Greebel's ("Defendant"), June 12, 2020 opposition to the government's writs of continuing garnishment to garnishees Merrill Lynch, Pierce, Fenner & Smith Inc. [Dkt 694] and Charles Schwab Retirement Plan Services [Dkt 703] ("Opposition"). The parties are continuing their discussions in an effort to resolve these garnishment actions without the need for further litigation. The government therefore respectfully requests, with Defendant's consent, this extension until August 17, 2020 in order to conclude those discussions and submit its response.

This is the government's second request for an extension of time to file its response to Defendant's Opposition. The Court has previously granted one request by the government, with Defendant's consent, for an extension of fourteen days, and four requests by Defendant, with the government's consent, to extend Defendant's deadline to file its Opposition, for a total extension of 140 days.¹ See Dkt 726, 728, 730 & 735. Defendant has consented to this request. There are currently no other scheduled deadlines or court appearances that will be affected should the Court approve this request. Additionally, Defendant requests, with the government's consent, that the Court set September 11, 2020, as the due date for his reply.

¹ Prior to Feb 2, 2020, the Court had granted three extensions of time, totaling 356 days, for Defendant to submit his opposition to the writs of continuing garnishment while Defendant appealed his conviction in this matter. See Dkt 699, 708 & 720.

The government thanks the Court for its attention to this matter.

Respectfully submitted,

SETH D. DUCHARME
Acting United States Attorney

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cc: All Counsel of Record via ECF